

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

DEC 10 2015

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

LATASHIA F. MORROW,

Defendant.

4:15CR552 CEJ/NCC

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

[Possession of an Unlawfully Produced Identification Document or Authentication Feature]

On or about December 1, 2015, in the Eastern District of Missouri, the defendant,

**LATASHIA F. MORROW,**

did knowingly possess an identification document or authentication feature, to wit, a social security card bearing the defendant's name with SS# xxx-xx-0138, that is or appears to be an identification document or authentication feature of the United States which is stolen or produced without lawful authority knowing that such document or feature was stolen or produced without such authority, with the identification document or authentication feature being or appearing to have been issued by or under the authority of the United States, and the offense involved the production or transfer of an identification document, authentication feature, or false identification document that is or appears to be an identification document or authentication feature issued by or under the authority of the United States, all in violation of 18 U.S.C. § 1028 (a)(6) and (b)(1)(A)(i).

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 982 (a)(2)(B) and 1028 (b)(5), upon conviction of an offense in violation of Title 18, United States Code, Section 1028 (a)(6) as set forth in Count 1 of this Indictment, the defendant, **LATASHIA F. MORROW**, shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s) and any personal property used or intended to be used to commit the offense(s).

2. Subject to forfeiture is a sum of money equal to the value of the property constituting, or derived from proceeds the defendant obtained directly or indirectly as a result of such violation.

3. Specific property subject to forfeiture includes, but is not limited to, the following:

- a. re-encoded and original gift cards;
- b. counterfeit social security cards.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: \_\_\_\_\_

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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Gilbert C. Sison  
Assistant United States Attorney